

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DEFENDANTS ALLERGAN PLC, ALLERGAN FINANCE, LLC,
ALLERGAN SALES, LLC, AND ALLERGAN USA, INC.'S
INDIVIDUAL MOTION FOR SUMMARY JUDGMENT**

For the reasons set forth more fully in the accompanying Memorandum In Support Of Defendants Allergan plc, Allergan Finance, LLC, Allergan Sales, LLC, and Allergan USA, Inc.'s Individual Motion for Summary Judgment, and the documents attached thereto, Defendants Allergan plc f/k/a Actavis plc (specially appearing), Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., Allergan Sales, LLC, and Allergan USA, Inc. move the Court for summary judgment under Federal Rule of Civil Procedure 56 on all counts in the Third Amended Complaints filed by Track 1 Plaintiffs, Summit County (ECF No. 1466) and Cuyahoga County (ECF No. 1631), or in the alternative, on the issues of whether Allergan is liable for the conduct of Alpharma and the Actavis Generic Entities, or as the Court otherwise deems proper.

WHEREFORE, Defendants Allergan plc f/k/a Actavis plc (specially appearing), Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., Allergan Sales, LLC, and Allergan USA, Inc. respectfully request that the Court grant their motion for summary judgment.

Respectfully submitted,

Dated: June 28, 2019

/s/ Donna M. Welch

Donna M. Welch, P.C.
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2000
donna.welch@kirkland.com

Attorney for Defendants Allergan plc f/k/a Actavis plc (appearing specially), Allergan Finance, LLC (f/k/a/ Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.), Allergan Sales, LLC, and Allergan USA, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on July 19, 2019, she caused a copy of the foregoing to be served upon all Parties via electronic mail.

Respectfully submitted,

/s/ Donna M. Welch
Donna M. Welch